

Mitchell Schuster (MS 6653)

Jeffrey A. Kimmel (JK 0584)

MEISTER SEELIG & FEIN LLP

2 Grand Central Tower

140 East 45th Street

19th Floor

New York, NY 10017

(212) 655-3500

Attorneys for Defendant, Bridgestone Industrial Products America, Inc.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

X

WEEKS MARINE, INC., individually	:	
and on behalf of a class of all those	:	
similarly situated,	:	
Plaintiff,	:	07 CIV 6811
- against -	:	
BRIDGESTONE CORPORATION;	:	NOTICE OF MOTION
BRIDGESTONE INDUSTRIAL	:	FOR ADMISSION
PRODUCTS AMERICA, INC.;	:	PRO HAC VICE
TRELLEBORG INDUSTRIE S.A.;	:	OF HAROLD R. DONNELEY, ESQ.
DUNLOP OIL & MARINE LTD.;	:	
PARKER ITR S.L.R.; MANULI	:	
RUBBER INDUSTRIES S.P.A.;	:	
MANULI OIL & MARINE (U.S.A.)	:	
INC.; YOKOHAMA RUBBER CO.,	:	
LTD.; PW CONSULTING (OIL AND	:	
MARINE) LTD.; PETER WHITTLE;	:	
DAVID BRAMMAR; BRYAN	:	
ALLISON; JACQUES COGNARD;	:	
CHRISTIAN CALECA; MISAO HIOKI;	:	
FRANCESCO SCAGLIA; and VANNI	:	
SCODEGGIO,	:	
Defendants.	:	

2007 AUG 24 PM 12:11
U.S. DISTRICT COURT
CLERK'S OFFICE
NEW YORK

PLEASE TAKE NOTICE that upon the annexed Affidavit of Jeffrey A. Kimmel, sworn to August 23, 2007, together with the exhibit submitted therewith, the undersigned will move this Court before the Honorable Alvin K. Hellerstein, United States District Judge, at the United

States District Court for the Southern District of New York, 500 Pearl Street, Room 1050, New York, New York, for an order, pursuant to Rule 1.3(c) of the Local Rules for the United States District Courts for the Southern and Eastern Districts of New York, admitting Harold R. Donnelly, Esq. to the bar of this Court *pro hac vice* in order to argue or try the above-captioned case on behalf of Defendant Bridgestone Industrial Products America, Inc.

Dated: New York, New York
August 23, 2007

Respectfully submitted,

MEISTER SEELIG & FEIN LLP⁷

By: _____
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Jeffrey A. Kimmel (JK 0584)
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New York, NY 10017
(212) 655-3500

*Attorneys for Defendant
Bridgestone Industrial Products America, Inc.*

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Attorneys for Plaintiff Weeks Marine, Inc.

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(212) 655-3500

Attorneys for Defendant, Bridgestone Industrial Products America, Inc.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----x

WEEKS MARINE, INC., individually	:	
and on behalf of a class of all those	:	
similarly situated,	:	
 Plaintiff, :		07 CIV 6811
 - against - :		 AFFIDAVIT OF JEFFREY A. KIMMEL, ESQ. IN SUPPORT OF MOTION FOR ADMISSION PRO HAC VICE OF HAROLD R. DONNELLY, ESQ.
BRIDGESTONE CORPORATION;	:	
BRIDGESTONE INDUSTRIAL	:	
PRODUCTS AMERICA, INC.;	:	
TRELLEBORG INDUSTRIE S.A.;	:	
DUNLOP OIL & MARINE LTD.;	:	
PARKER ITR S.L.R.; MANULI	:	
RUBBER INDUSTRIES S.P.A.;	:	
MANULI OIL & MARINE (U.S.A.)	:	
INC.; YOKOHAMA RUBBER CO.,	:	
LTD.; PW CONSULTING (OIL AND	:	
MARINE) LTD.; PETER WHITTLE;	:	
DAVID BRAMMAR; BRYAN	:	
ALLISON; JACQUES COGNARD;	:	
CHRISTIAN CALECA; MISAO HIOKI;	:	
FRANCESCO SCAGLIA; and VANNI	:	
SCODEGGIO,	:	
 Defendants. :		

-----x

JEFFREY A. KIMMEL, being first duly sworn, deposes and says:

1. I am a partner in the firm of Meister Seelig & Fein LLP. I respectfully submit this Affidavit in support of the instant motion, pursuant to Rule 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, for an order granting Harold R. Donnelly, Esq. admission to the bar of the United States District Court for the Southern District of New York *pro hac vice* in order to argue and try the above-captioned case.

2. I am a member in good standing of the bar of this Court.

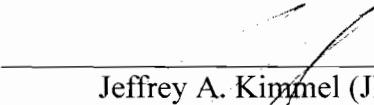
3. Mr. Donnelly is a solo practitioner in Nashville, Tennessee. He was admitted to the bar of the United States District Court for the Middle District of Tennessee in November 19, 2005, and is a member in good standing of the bar of the United States District Court for the Middle District of Tennessee. An original certificate of good standing issued by the United States District Court for the Middle District of Tennessee is annexed hereto as **Exhibit A**.

4. There are no pending disciplinary proceedings against Mr. Donnelly in any State or Federal court.

5. I believe that Mr. Donnelly is of the highest character, reputation and competence. It is respectfully submitted that Harold R. Donnelly, Esq. is well qualified for admission *pro hac vice*.

WHEREFORE, it is respectfully requested that the Court grant the motion for admission
pro hac vice.

Subscribed and affirmed to under the
penalties of perjury on August 23, 2007


Jeffrey A. Kimmel (JK-0584)

2 Grand Central Tower
140 East 45th Street
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New York, NY 10017
(212) 655-3500
Attorneys for Defendant
Bridgestone Industrial Products America, Inc.

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE



CERTIFICATE OF GOOD STANDING

I, KEITH THROCKMORTON, Clerk of the United States District Court for the Middle District of Tennessee, do hereby certify that HAROLD R. DONNELLY was duly admitted to practice in said Court on **November 19, 2005** and is in good standing as a member of the bar of said Court.

Dated at Nashville, Tennessee on August 7, 2007.

KEITH THROCKMORTON, CLERK



Angie Brewer

Deputy Clerk

Mitchell Schuster (MS 6653)

Jeffrey A. Kimmel (JK 0584)

MEISTER SEELIG & FEIN LLP

2 Grand Central Tower

140 East 45th Street

19th Floor

New York, NY 10017

(212) 655-3500

Attorneys for Defendant, Bridgestone Industrial Products America, Inc.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----x

WEEKS MARINE, INC., individually :

and on behalf of a class of all those :

similarly situated, :

Plaintiff, : 07 CIV 6811

- against - :

BRIDGESTONE CORPORATION; :

BRIDGESTONE INDUSTRIAL :

PRODUCTS AMERICA, INC.; :

TRELLEBORG INDUSTRIE S.A.; :

DUNLOP OIL & MARINE LTD.; :

PARKER ITR S.L.R.; MANULI :

RUBBER INDUSTRIES S.P.A.; :

MANULI OIL & MARINE (U.S.A.) :

INC.; YOKOHAMA RUBBER CO., :

LTD.; PW CONSULTING (OIL AND :

MARINE) LTD.; PETER WHITTLE; :

DAVID BRAMMAR; BRYAN :

ALLISON; JACQUES COGNARD; :

CHRISTIAN CALECA; MISAO HIOKI; :

FRANCESCO SCAGLIA; and VANNI :

SCODEGGIO, :

Defendants. :

-----x

ORDER ADMITTING COUNSEL PRO HAC VICE

This matter having been brought before the Court by motion of Jeffrey A. Kimmel, Esq. attorney for the defendant Bridgestone Industrial Products America, Inc., and the Affidavit of Jeffrey A. Kimmel Esq. in Support, pursuant to Rule 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, for the admission *pro hac vice* of Harold R. Donnelly, Esq. in the above-captioned matter, it is on this ____ day of _____ hereby

ORDERED that the motion is GRANTED, and

IT IS FURTHER ORDERED THAT Harold R. Donnelly, Esq. shall be admitted *pro hac vice* as counsel for Bridgestone Industrial Products America, Inc. in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the *pro hac vice* fee to the Clerk of Court.

Dated:

New York, New York

SO ORDERED:

United States District Judge

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

WEEKS MARINE, INC., individually	:	
and on behalf of a class of all those	:	
similarly situated,	:	
 Plaintiff,	 :	 07 CIV 6811
 - against -	 :	
 BRIDGESTONE CORPORATION;	 :	 <u>CERTIFICATE OF SERVICE</u>
BRIDGESTONE INDUSTRIAL	:	
PRODUCTS AMERICA, INC.;	:	
TRELLEBORG INDUSTRIE S.A.;	:	
DUNLOP OIL & MARINE LTD.;	:	
PARKER ITR S.L.R.; MANULI	:	
RUBBER INDUSTRIES S.P.A.;	:	
MANULI OIL & MARINE (U.S.A.)	:	
INC.; YOKOHAMA RUBBER CO.,	:	
LTD.; PW CONSULTING (OIL AND	:	
MARINE) LTD.; PETER WHITTLE;	:	
DAVID BRAMMAR; BRYAN	:	
ALLISON; JACQUES COGNARD;	:	
CHRISTIAN CALECA; MISAO HIOKI;	:	
FRANCESCO SCAGLIA; and VANNI	:	
SCODEGGIO,	:	
 Defendants.	 :	

I HEREBY CERTIFY that the foregoing Notice of Motion for Admission *Pro Hac Vice* of Harold R. Donnelly, Esq., Affidavit of Jeffrey A. Kimmel, Esq. in Support and Order Admitting Counsel *Pro Hac Vice* was served by delivering a true copy thereof via mail and also enclosed in a sealed wrapper to the exclusive care, custody, and control of the United States Postal Service, on August 23, 2007, addressed to the parties as follows:

Robert G. Eisler
 Seth R. Gassman
 COHEN, MILSTEIN, HAUSFIELD & TOLL, PLLC
 150 East 52nd Street, 30th Floor
 New York, NY 10022

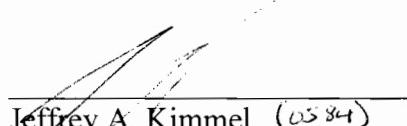
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Steven O. Sidener
Joseph M. Barton
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San Francisco, CA 94105

Attorneys for Plaintiff Weeks Marine, Inc.

Dated: August 23, 2007



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*Attorneys for Defendant
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